

24 May 2021

Conservation Services Programme  
Department of Conservation -Te Papa Atawhai  
18 Manners Street  
Wellington 6011

Dear Conservation Services Programme

### **Submission on DRAFT Conservation Services Programme Annual Plan 2020/21**

Thank you for the opportunity to comment on the DRAFT Conservation Services Programme (CSP) Annual Plan 2020/21. Please find my comments below.

1. *Observing commercial fisheries:* I note that this project is being consulted on separately and that the process is being led by Fisheries New Zealand (FNZ). It would be very useful to see a list of priority fisheries that CSP proposes to cover for the 2020/21 year so that stakeholders can understand what CSO sees as priorities. I would suggest that this is something that CSP should consider for future Annual Plans rather than trying to integrate it into the planning process for this round. This would improve clarity around CSP process as it is presently difficult to weigh up the competing CSP projects without a breakdown and understanding of the fisheries which have bycatch issues. Please note that I have identified several projects below which I believe should be included in the discussion of Observer coverage including Cook Strait trawl fishery for hoki and small vessel (i.e., <28m) trawl fishery in Taranaki/Cook Strait.
2. *INT2021-03:* I support this project as it is long overdue to investigate this bycatch. I note that there is no intention to provide estimated values of total bycatch based on scaling up from observer coverage and suggest that this might be an area for future CSP funding.
3. *INT2021-04:* I support this project. I note that there may be practicalities and logistical benefits of combining the curation of tissues from seabirds, marine mammals, reptiles and other species into a consistent and single location and process. I would recommend that consideration be given to this.
4. *POP2018-03:* It was very disappointing to see that this project was not delivered in 2020/21 as I note that that least two other sub-Antarctic research projects were undertaken in 2020/21. I would strongly recommend that CSP start exploring contingency plans for the delivery of the New Zealand sea lion project for 2021/22 in the event that DOC internal process do not allow this research to proceed.

5. *POP2021-03*: I support this follow up project but would note that it was only undertaken as other seabird research in the subantarctic region was cancelled by DOC in 2020/21. I would expect that the normal suite of seabird projects should restart in the subantarctic region in 2021/22 also noting the comment in Item 4 above which also relates to seabird research.
6. *POP2021-06*: I strongly support this project and congratulate CSP for including this new project in their draft plan. This is an issue that has been long ignored. However, I believe that this project is significantly underfunded for the following reason: (i) there are more than dozen fur seal colonies that will need to be visited in the Cook Strait region to meet the stated objectives of this project – some of which can only be reached by vessel; (ii) genetic analysis of fur seal samples is expensive and will require analysis of both samples collected from colonies (e.g., to establish genetic markers for each colony) as well as analysis of bycatch samples. This is expensive and will not be able to be covered by the budget; and (iii) the stated outputs require three separate reports to be provided plus significant field work to be completed all for \$60k. The only way that this may be able to be delivered is if there is significant additional internal investment from DOC (e.g., personnel time, vessel time, etc.) which amounts to a large subsidy to fishers. I would recommend that the project budget for the first year is re-assessed and increased to at least \$100k as I do not believe it can be delivered for the amount indicated. In addition, I would recommend that this issue is included in the discussion of Observer coverage as this fishery desperately needs increased coverage to assess the extent of this interaction.
7. *MITIGATION PROJECTS*: I reiterate my previous comments about the focus of the CSP. There are very few mitigation projects included in the draft Annual Plan which is a large gap given that mitigation should be a major focus of CSP. Most of the proposed projects are related to POP (Population) or INT (Interaction) projects which, while also of course being important, will not actually lead to a reduction in bycatch rates. I would draw CSP attention to some recommended MIT projects identified in previous CSP reports (e.g., MIT2019-1, MIT2016-2) which make recommendations for project work. DOC has said that the presently running CSP Mitigation Gaps Project has not yet been completed and therefore these projects have not been used in the present round of projects. I would suggest that DOC should bring some of these MIT projects forward for this year or we will lose a whole year of work waiting for the outcome of that project. DOC should be able to look at existing review projects by CSP (and also potentially the NZ sea lion and Hector's/Maui dolphin Treatment Management Plan (TMP) processes which also have some recommended mitigation projects). These reports have been completed, presented to, and discussed with Stakeholders and therefore represents a source of some highly relevant and appropriate projects. I would recommend that additional MIT projects are included in the 2021/22 Annual Plan.
8. *MIT2021-01*: I support this project. I note that increased reporting and measures of success of this project are to be improved which I commend as results from similar projects in the past have been difficult to assess.

9. *MIT2021-02*: I strongly support this project. I would recommend that this budget is increased by \$10k specifically to support that travel of relevant fishers and experts with experience in this area to Kaikoura, potentially including fishers from Australia who have been trialling some mitigation options that may be relevant to NZ fisheries to share their experience with NZ fishers. There is considerable international development work on this issue, and it will be important to seek the participation of overseas experts to make this most of this project. A separate recommendation would be that consideration should be given to assessing the level of interaction rates with humpback whales and southern right whales in NZ. This could be possible through analysis of existing photos of these species to assess the proportion of whales that show scars from interactions with set nets and cray pots (e.g., Robbins 2009; Neilson et al. 2009 ).
10. *COMMON DOLPHIN BYCATCH*: I note that there is no research on the significant common dolphin bycatch in the Taranaki trawl fishery using small vessels (i.e., vessels <28m). This is despite an average of 88 (max = 137) dolphins being killed annually in these fisheries over the period 2003 to 2015 when records end (Data from the MPI PSD) for a total of over 1,100 dolphins. I strongly recommend that CSP include consideration of this issue in the discussion of observer coverage as I note that FNZ have suggested that these estimates are result of low and incomplete observer coverage.
11. *MISSING PROJECTS*: I note an absence of several key projects and species from the draft Plan. I will address these individually:
  - a. Hector's and Maui dolphin – there are no projects at all in the draft paper about this. This is extraordinary given the potential project work identified in the Threat Management Plan and the threat status of these sub-species. The CSP Research Advisory Group (RAG) had a range of projects considered (e.g., INT-6, POP-19, POP-20 plus some other independently proposed projects which never made it onto the list for consideration) in early 2021 but none of these projects made it into the draft Plan. This is a significant oversight by CSP. DOC may argue that this work is being undertaken under separate processes but there is no indication of this evident to external stakeholders. I would strongly recommend that DOC reconsider this omission as it sends the wrong impression to stakeholders that bycatch is not an issue for these dolphins and is a clear lack of leadership by DOC who are the lead Agency for the recovery of these sub-species.
  - b. Hoiho – Given the significant focus and research to date on this species, it is surprising that there is no single project proposed even though there were two projects (e.g., INT-2, MIT-3) considered as part of the CSP RAG process which scored reasonably high.
  - c. subantarctic Albatross – There are no projects on any subantarctic Albatross (e.g., White-capped, Gibson's, Southern Royal, Light Mantled Sooty) which is surprising given the long term monitoring projects that have been supported by CSP over the last decade or more. It is no clear why these long term monitoring projects are long longer being supported.

Please feel free to contact me if you have any questions about any of the issues that I have raised.

Yours sincerely

Scientist

A handwritten signature in black ink, appearing to read 'S Childerhouse', with a long horizontal flourish extending to the right.

Simon Childerhouse PhD  
Senior Marine Mammal Ecologist  
Coastal & Freshwater Group  
Cawthron Institute